

LAW OFFICES OF DALE K. GALIPO  
Dale K. Galipo, Esq. (Bar No. 144074)  
[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)  
Shannon J. Leap (Bar No. 339574)  
[sleap@galipolaw.com](mailto:sleap@galipolaw.com)  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, California 91367  
Tel: (818) 347-3333  
Fax: (818) 347-4118

*Attorneys for Plaintiffs A.J.P., et al.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

A.J.P. and A.M.P., minors, by and through their guardian *ad litem* Cynthia Nunez, individually and as successor in interest to Albert Perez, deceased; and PATRICIA RUIZ, individually,

**Plaintiffs,**

vs.

COUNTY OF SAN BERNARDINO;  
and DOES 1-10, inclusive.

## Defendants.

Case No. 5:22-cv-01291-SSS-SHK

*Hon. Sunshine S. Sykes,  
Hon. Magistrate Shashi H. Kewalramani*

**DECLARATION OF SHANNON J.  
LEAP IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

[Filed concurrently with Plaintiffs' Memorandum of Points and Authorities in Opposition; Plaintiffs' Separate Statement of Facts and Additional Material Facts, Plaintiffs' Objections to Defendants' Evidence, Declaration of Scott DeFoe, and Declaration of Bennet Omalu, M.D.).

Date: April 19, 2024

Time: 2:00 P.M.

## Courtroom: Courtroom 2, 2nd Floor

1  
2  
**DECLARATION OF SHANNON J. LEAP**  
3  
4

5 I, Shannon J. Leap, hereby declare as follows:  
6  
7

8 1. I am an attorney licensed to practice law in the State of California and  
9 the United States District Court for the Central District of California. I am one of the  
10 attorneys of record for the Plaintiffs. I make this declaration in support of Plaintiffs'  
11 Opposition to Defendants' Motion for Summary Judgment. I have personal  
knowledge of the facts contained herein and could testify competently thereto if  
called.  
12

13 2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the  
relevant pages of Deputy David Moore's Deposition ("Moore Depo"), taken on  
September 15, 2023.  
14

15 3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the  
relevant pages of Deputy Andrew Pollick's Deposition ("Pollick Depo"), taken on  
September 15, 2023.  
16

17 4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the  
relevant pages of Deputy Christina Olivas' Deposition ("Olivas Depo"), taken on  
October 3, 2023.  
18

19 5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the  
relevant pages of Corporal Cory McCarthy's Deposition ("McCarthy Depo"), taken on  
November 9, 2023.  
20

21 6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the  
relevant pages of Deputy Joshua Stone's Deposition ("Stone Depo"), taken on  
December 14, 2023.  
22  
23  
24  
25  
26  
27  
28

1       7. Attached hereto as “**Exhibit 6**” is a true and correct copy of the  
2 relevant pages of Sergeant Luke Gaytan’s Deposition (“Gaytan Depo”), taken on  
3 December 14, 2023.

4       8. Attached hereto as “**Exhibit 7**” is a true and correct copy of the  
5 relevant pages of Deputy Anthony Alcala’s Deposition (“Alcala Depo”), taken on  
6 December 28, 2023.

7       9. Attached hereto as “**Exhibit 8**” is a true and correct copy of the  
8 relevant pages of Reporting Party Helen Fregoso’s Deposition (“Fregoso Depo”),  
9 taken on January 30, 2024.

10 I declare under penalty of perjury under the laws of the United States that the  
11 foregoing is true and correct. Executed this 15th day of March, 2024 in Woodland  
12 Hills, California.

/s/ *Shannon J. Leap*

Shannon J. Leap

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28